

transmission proposed by the Association of Federal Communications Consulting Engineers ("AFCCE"). 48/ AFCCE's planning factors match "real world" transmission factors better than those used in the FCC and Broadcasters Caucus/MSTV allocation plans by including multiple noise sources, TV antenna download loss and the antenna dipole factor. 49/

The centerpiece of the AFCCE's proposal is the establishment of two grades of DTV service, with their division defined by the contour of the radio horizon. This two-grade system provides a practical approach to the problem of attempting to replicate VHF coverage on UHF channels. Telemundo supports this approach, and also maintains that in certain cases such as those where a VHF TV station is serving a rural population scattered over a wide area or where the terrain is rugged, such as in Puerto Rico, stations should be allowed to return to their original VHF channel for DTV operations at their discretion.

AFCCE's concerns about DTV to NTSC adjacent channel interference warrant further review by the Commission of this potentially debilitating issue. 50/ Based on the analysis set forth in the AFCCE Comments, 51/ KVEA's transmission

48/ See Comments of AFCCE, Planning Factors for HDTV Broadcasting: A Proposal.

49/ See *id.* at 7.

50/ See *id.* at 10-11.

51/ "[I]t is our understanding that a practical DTV transmitter complying with the Commission's proposed emission mask and not exceeding the D/U ratio would, in fact, create interference . . . under the conditions of colocation where it is assumed that the DTV channel power was 12 dB below the adjacent NTSC station power." *Id.* at 10-11.

from Mount Wilson, California on channel 52 would receive interference from the proposed KABC DTV assignment on channel 53. In this case, KABC's channel 53 DTV power of 662.7 kw. is only 5.9 dB below that of KVEA's channel 52 NTSC power of 2570 kw. ATSC/ATTC tests showed that a minus 12 dB DTV/NTSC power ratio was needed to prevent DTV interference into a lower adjacent NTSC channel. In addition, AFCCE's examination of adjacent band issues supports Telemundo's assertion that DTV operation on adjacent channels to land mobile facilities is ill-advised. 52/

Telemundo supports AFCCE's call for a "TASO-II" study of DTV allocation and transmission technical issues. Failure to clearly define the real world practical aspects of DTV transmission will, at best, result in inefficient use of spectrum and reduced service to the public. At worst, it could lead to the failure of broadcast over-the air-DTV and the consequent loss of free, universal TV service to much of the population.

VII. Conclusion

As demonstrated by Telemundo in its initial Comments and confirmed by many of the comments submitted in this proceeding, the DTV Table proposed by the Commission would diminish Telemundo's ability to reach Spanish-speaking audiences and significantly impact the diversity of programming available to the public. Accordingly, Telemundo respectfully urges the Commission to adopt a revised DTV table that preserves Telemundo's ability to compete in the Los Angeles

52/ See *id.* at 12-13.

DTV marketplace, avoids substantial DTV white areas in Puerto Rico, protects LPTV and TV translator services, and incorporates engineering measures that will improve service to urban populations.

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of January, 1997, I caused to be served by hand delivery, copies of the foregoing Reply Comments of Telemundo Group, Inc., addressed to the following:

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